

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

WINC, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11238 (LSS)

(Jointly Administered)

**Re: Docket No. 61**

**CERTIFICATION OF COUNSEL REGARDING PROPOSED  
ORDER (I) AUTHORIZING THE DEBTORS TO RETAIN AND COMPENSATE  
PROFESSIONALS UTILIZED IN THE ORDINARY COURSE OF BUSINESS AND  
(II) WAIVING CERTAIN INFORMATION REQUIREMENTS OF LOCAL RULE 2016-2**

On December 16, 2022, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of an Order (I) Authorizing the Debtors to Retain and Compensate Professionals Utilized in the Ordinary Course of Business and (II) Waiving Certain Information Requirements of Local Rule 2016-2* [Docket No. 61] (the “Motion”). Pursuant to the Motion, responses to the entry of the proposed form of order (the “Proposed Order”) attached to the Motion were to be filed and served no later than 4:00 p.m. (ET) on December 30, 2022 (the “Objection Deadline”).

Prior to the Objection Deadline, the Debtors received informal comments from the Official Committee of Unsecured Creditors (the “Committee”). As a result of discussions between the Debtors and the Committee, such comments have been resolved as reflected in the revised Proposed Order attached hereto as **Exhibit A** (the “Revised Proposed Order”). For the convenience of the Court and interested parties, a blackline comparing the Revised Proposed Order to the Proposed Order is attached hereto as **Exhibit B**. No other responses were received by the Debtors.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Winc, Inc. (8960); BWSC, LLC (0899); and Winc Lost Poet, LLC (N/A). The Debtors’ mailing address for purposes of these chapter 11 cases is 12405 Venice Boulevard, Box #1, Los Angeles, CA 90066.

The Debtors submit that the Revised Proposed Order is appropriate and consistent with the relief requested in the Motion and their discussions the Committee, and that the Committee does not object to entry of the Revised Proposed Order. Accordingly, the Debtors respectfully request that the Court enter the Revised Proposed Order at its earliest convenience without further notice or hearing.

Dated: January 3, 2023  
Wilmington, Delaware

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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Debtors in Possession*